

Comments about proposed EPA changes From Wisconsin Focus on Energy staff

Thank you for the opportunity to comment on these proposals. It is important that leaders in the HP world set standards and protocols that assure strong and accountable programs. HP is gaining a high profile and is recognized as our country's best vehicle for improving the efficiency of its housing stock. As we move toward a system of monetizing Carbon credits, actual and verifiable savings must be garnered. To the end that these proposals collectively move us to increase the effectiveness of delivered services, so much the better.

Any one of these proposals seems legitimate and necessary at certain stages of a program's growth, save the CHA suggestions which we will comment on later.

For existing programs, many of your proposed procedures are already implemented. Perhaps we can be of service by sharing our experience with others. We suggest that you elicit forms, procedures, documents, etc. from existing programs to pass on to the new and yet-to-be-born programs, such that the wheel does not need to be re-created.

Wisconsin will be more than happy to share its administrative inner workings with you.

Comments listed below by section

P1

All consultant generated jobs offer, in effect, 100% post inspections. The consultant acts as the third party verification. Since his/her business credibility is on the line, s/he works closely with contractors to assure quality is maintained.

We have a QA and QC policy that conforms to the lesser of two proposed rates.

The 15% post inspection criteria are contained in the Agreement- Sara has commented already.

If WI is considered "BPI equivalent" then we can skip the 15% rate. We see this a too high a rate for established contracting firms.

We may support a 15% rate the first year of a contractor's tenure, then drop to standard rate upon successful work record.

THE PROPOSALS:

- 1). We already report all jobs into the central office, even those that are "preliminary" only.
- 2). Paper review of all ratings is currently done; evaluations are entered into database. Files reviewed. RESNET protocols for field QC are followed.
- 3). Surveys are already given to all HP customers in Wisconsin. Our next iteration will include questions asking home-owners what actions they have taken as a result of our collective efforts that are not tracked or rewarded, (free-drivers.)
- 4,5). Should not be a problem- we have systems in place to track this.

OTHER COMMENTS:

We can send you our policies and forms to the EPA office- QA, QC, survey, etc.

Generally these proposals are reasonable, except for 15% post-inspection requirement. This is a bit high, and seems to conflict with other language in this section.

P2

It is important to track program activities to understand market penetration. We track these activities in our databases and find no problems here.

THE PROPOSALS:

- 1). We are willing to provide all categories of service providers
- 2). This is good information we should be tracking anyway
- 3). We are tracking this information.

OTHER COMMENTS:

The minimum job numbers are of no concern to us. All changes are reasonable, and the removal of referrals and savings projections is welcome.

P3

Standardization of “energy audits” is a laudable goal, but fraught with many pitfalls, given the nature of differing housing stock, climate, and program intent. Market-based programs will invariably find proscriptive lists difficult and counter-productive to achieving public acceptance. Certain regions of the nation have a “jump-start” on the whole-house process; Wisconsin for example has 90% penetration rate for 90+ furnaces and experiences a large ratio of owner-done retrofits, in part driven by past utility conservation programs that downplayed the Building Science component of energy retrofits. The low-hanging fruit has been plucked. Requiring an exhaustive battery of tests drives up customer costs, without the concomitant potential for big savings.

THE PROPOSALS:

What do we call it---

Performance Tested Home Assessment?

Residential Energy evaluation?

Instrumented Home Assessment?

Section B. This should be optional. If anything, let EPA develop a spreadsheet where we can plug in the consumption data, pull out baseline, and get a BTU/ft²/DD value we can use. This is a harsh requirement. At most, run a pilot.

As far as programs that don’t use modeling, little will be gained by requiring consumption data, since the only real value I see of current software is prioritizing of proposed measures. Ratings cost more to the public, and adding real data is an excellent way to true-up the information while making the service less affordable to many people.

Section F.3. Again, let EPA give us the literature to pass on if at all. If testing is to be done, it must be pre and post, or we get into liability issues: “Your work caused my house to have elevated radon.” You are adding more costs, more time, more hurdles. Touch the issue, raise it, and you buy the consequences.

Section E.b.i. Nix to duct leakage. Not applicable in WI.

I think the suggested protocols is a great list for low-income and subsidized programs, but not market-based. These added costs and increased time involved can be buried in larger, whole-house jobs where greater levels of work are present. I think we stick to the basics- there is not a widespread market for these services. Sponsors would be forced to subsidize these CHA’s in order to maintain the current level of activity. Got an extra \$100 per evaluation? We did 1600 last year!

As an alternative, we will consider that all consultants and Qualified contractors be trained in these “next level” diagnostics- electric audit, water usage, bill analysis, duct leakage testing, oven CO, Radon, air-flow, static pressure, etc. over a two-three day period. Then they will have the capacity to offer these services as customers request and are willing to pay.

Anyone who has seriously sought to understand the dynamics of energy usage and related performance issues in homes knows that an entire day could be spent in diagnostic work. We need to consider cost vs. benefit vs. number of homes we can address and retrofit. We are currently in the first and second round of retrofits, we are getting the quickest savings first. After that we can fine-tune; some will want to fine tune and get complete potential savings, but until we have an infrastructure that can address the needs of a nation, let’s not over-burden what little resources we possess.

P4

THE PROPOSALS: Develop a certification of completion, listing work done, etc. etc.

We do this with Energy Star rating cert. No problems with this. Just takes more time and money.